



## North Carolina Department of Environment and Natural Resources

Dexter Matthews, Director

Division of Waste Management  
Solid Waste Section  
Winston-Salem Regional Office

Beverly Eaves Perdue, Governor  
Dee Freeman, Secretary

February 18, 2011

Duke Energy  
Attn: Ed Sullivan, P.E.  
Mail Code EC13K  
PO Box 1006  
Charlotte, NC 28201-1006

SUBJECT: Solid Waste Management Plan  
Duke Energy – Belews Creek Steam Station  
Craig Road Landfill - Permit 85-04  
FGD Residue landfill - Permit 85-05

Dear Mr. Sullivan:

On December 20, 2010, S&ME, Inc. on behalf of Duke Energy submitted to the Solid Waste Section (Section) the 10-year comprehensive solid waste management plan for the Craig Road and FGD Residue Landfills at the Belews Creek Steam Station in Stokes County as required by N.C.G.S 130A-309.09D(c).

At this time the Section has completed an initial review of those documents. The following areas are of concern and should be addressed **upon receipt of this letter**:

1. The plans do not establish a waste reduction goal for either of the two facilities as required by 130A-309.09D(c)(1). Once a goal is established, a description of how that goal will be met must also be included per (c)(2).
2. The plan is only designed for the 5 year period of 2007-2012. 130A-309D(c)(3) requires that planning occur for a period of ten years. The plan should address waste generation, disposal capacities, waste reduction, etc for the period of 2011-2021.
3. The plan should include a contingency plan for the disposal of all ash generated at the Belews Creek Steam Station. This should take into account any potential changes that may occur during the planning period due to Federal and/or State law changes related to Coal Ash management.

In 2009-10, approximately 258,000 tons of ash from the Belews Creek Steam Station was reported by Duke Energy to go to other uses. This type of information (both actual and projected data) should be included in your waste management plans as waste reduction efforts to keep ash out of the landfills, but also needs to be addressed in your possible disposal needs moving forward should these other uses decrease or cease to exist.

One  
North Carolina  
*Naturally*

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If you have any questions or need assistance regarding this matter, please contact me by telephone at (336) 771-5092 or e-mail, [jason.watkins@ncdenr.gov](mailto:jason.watkins@ncdenr.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jason M. Watkins", with a stylized flourish at the end.

Jason M. Watkins  
Central District Supervisor  
Field Operations

Cc (via email): Mark Poindexter, Field Operations Branch Head  
John Patrone, Environmental Senior Specialist  
Ellen Lorscheider, Planning & Programs Branch Head  
Ethan Brown, Environmental Senior Specialist  
Melanie Martin, Duke Energy – Belews Creek  
Kimberlee Benson, P.E., Duke Energy – Belews Creek.